UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

craigslist, Inc., **Plaintiff,** **v.** **HENRY D. McMASTER, in his official capacity as ATTORNEY GENERAL OF THE STATE OF SOUTH CAROLINA, et al.** **Defendants.**	**Civil Action No.** 2:09-1308-CWH **ANSWERS OF CRAIGSLIST, INC. TO STANDARD INTERROGATORIES PURSUANT TO LOCAL RULE 26.01 DSC**

Plaintiff craigslist, Inc. ("craigslist"), pursuant to Local Civil Rule 26.01 DSC, respectfully submits the following answers to the Court's standard interrogatories under Local Civil Rule 26.01 DSC:

(A) State the name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: craigslist is not aware of any persons or legal entities who have a subrogation interest in the claims.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: All claims should be tried non-jury because craigslist seeks only declaratory and injunctive relief.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: craigslist is not a publicly owned company. eBay Domestic Holdings, Inc., a wholly-owned subsidiary of eBay, Inc., which is a publicly owned company owns ten percent or more of the outstanding stock of craigslist.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Assignment of this case to the Charleston Division of this Court is appropriate because Defendant McMaster's repeated threats to criminally prosecute craigslist and its management concern the operations of craigslist's services throughout the State of South Carolina. craigslist operates and maintains a particular site that is specifically directed at the Charleston, South Carolina, metropolitan area. The Charleston site is one of the two largest craigslist sites that are dedicated to South Carolina locales, and that site is regularly used by thousands of citizens within this division. Defendant McMaster's threatened prosecution therefore directly affects the operations of craigslist directed to the Charleston area and the expressive rights of craigslist and its users in this area. Accordingly, a substantial part of the events or omissions giving rise to Plaintiff's claim occurred and are occurring in the Charleston Division. Furthermore, upon information and belief, the following Defendants maintain residences within the Charleston Division, and/or have offices located in and transact business in the Charleston Division: 1st Circuit Solicitor David Pascoe (Dorchester

County), 3rd Circuit Solicitor C. Kelly Jackson (Clarendon County), 9th Circuit Solicitor Scarlett Wilson (Charleston and Berkeley Counties), 14th Circuit Solicitor I. McDuffie Stone (Colleton County), and 15th Circuit Solicitor Gregory Hembree (Georgetown County).

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Court of court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judge?

ANSWER: This action is not related to any other matter filed in this District.

DATED: May 19, 2009

Respectfully submitted,

s/Joseph P. Griffith, Jr.

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